

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PAINTERS DISTRICT COUNCIL NO. 14,)	
a labor organization,)	
)	
Plaintiffs,)	No. 11 C 9042
)	
v.)	
)	Judge Holderman
LASALLE GLASS & MIRROR CO.,)	
)	Magistrate Judge Kim
Defendant.)	

MOTION FOR ORDER OF DEFAULT AND JUDGMENT IN SUM CERTAIN

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ, and ARNOLD AND KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order of Default as to liability and Judgment in favor of Plaintiffs and against Defendant, LASALLE GLASS & MIRROR CO.

In support thereof, Plaintiffs state:

1. This case was filed on December 21, 2011.
2. Defendant was served with Summons and Complaint on January 6, 2012.
3. In excess of 20 days have expired since Service of Process, however, Defendant has failed to file an answer or otherwise plead.
4. Pursuant to the affidavit of Mike O'Donnell, the Glaziers Union Local 27 (affiliated with PDC 14) issued a joint arbitration board decision on May 31, 2011 against LaSalle in the amount of \$11,540.64. The award was served on defendant, but has not been paid.
(Exhibit A)

WHEREFORE, Plaintiffs pray for:

1. An order of default against defendant.

2. Judgment be rendered in the amount of \$11,540.64 in favor of plaintiffs and against defendant.

Respectfully submitted,

PAINTERS DISTRICT COUNCIL NO. 14

By: s/ Donald D. Schwartz
One of their Attorneys

Donald D. Schwartz
ARNOLD AND KADJAN
203 N. LaSalle St., Suite 1650
Chicago, Illinois 60601
(312) 236-0415